

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	Criminal No. 05-30042-MLW
v.)	
)	
CESAR CRUZ and RICARDO DIAZ,)	
Defendants)	

JOINT MOTION FOR
BILL OF PARTICULARS

The Defendants jointly move this Honorable Court for an order pursuant to the Federal Rules of Criminal Procedure 7(f) requiring the Government to disclose to them the following information as to Count I of the indictment charging the Defendants with Conspiracy to Possess with Intent to Distribute and Distribution of Cocaine Pursuant to Title 21:

- a. The specific date(s), time(s) and place(s) of the alleged conspiracy;
- b. The substance of the Defendants' conduct that the Government intends to prove in its case in chief;
- c. Names, addresses and dates of birth of any and all indicted and unindicted co-conspirators.

THE DEFENDANT
RICARDO DIAZ

THE DEFENDANT
CESAR CRUZ

/s/ Terry S. Nagel, Esq.
By His Attorney
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/s/ Joseph A. Franco, Esq.
By His Attorney
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AFFIDAVIT OF JOSEPH A. FRANCO IN SUPPORT OF
JOINT MOTION FOR
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Now comes Joseph A. Franco and states that he has personal knowledge of the facts contained herein and makes oath that they are true.

1. I, Joseph A. Franco, am a duly authorized and practicing attorney in the Commonwealth of Massachusetts admitted to practice before the United States District Court.
2. I have been appointed to represent the Defendant, Cesar Cruz, in the instant matter.
3. I have prepared the attached motion for Bill of Particulars.
4. The information sought is necessary for the preparation of this matter for trial.
5. The motion was prepared in good faith and in the best interest of my client.
6. I respectfully request that this motion be allowed.

Signed under the pain and penalty of perjury this 4th day of August, 2006.

/s/ Joseph A. Franco, Esq.
Joseph A. Franco, Esq.